



COMPLIANCE PROGRAM HOT LINE CHARTER SUMMARY DOCUMENT

- Supports effective lines of communication, an essential element of a compliance program
- Provides a confidential mechanism for workforce members to report concerns and allows reporters to remain anonymous
- Compels the Corporate Compliance Program to promptly and properly address and resolve compliance concerns brought to their attention.

Adoption:

Audit & Compliance Committee of the Board of Directors on 06/08/2010



HEALTH		Category: CCH SYSTEM WIDE	
Subject: CORPORATE COMPLIANCE		Page 1 of 2	Policy #: CC.
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PURPOSE

A primary function of the Corporate Compliance Program is to ensure that workforce members have an outlet to report problems and concerns if other processes are ineffective or inappropriate. The Corporate Compliance Hot Line is one mechanism to allow workforce members to report concerns confidentially, reporters may remain anonymous, thereby avoiding potential retaliation.

To support effective lines of communication, a hot line should be available to all workforce members 24/7 with both telephonic and electronic access; information about accessing the hot line should be conspicuously posted.

Matters reported through the hot line or other communication sources that suggest substantial violations of compliance policies, regulations, or statutes should be documented and investigated promptly to determine their veracity.

Cook County Health (CCH) has established and will maintain a Corporate Compliance Hot line function that meets the following terms:

- A. The Chief Compliance & Privacy Officer or designee is charged with ensuring that all issues reported to the Corporate Compliance Hot Line via telephone calls, via the online reporting method, or via other communication methods shall be acted upon in a timely fashion as required by CCH policies and procedures.
- B. All those who contact the hot line operation shall be assured anonymity, or in the case where the contact identifies themselves, confidentiality.
- C. All those who are employed and involved in the hot line operation are expected to act with utmost discretion and integrity in ensuring that information received is acted upon in a reasonable and proper manner.
- D. The Office of Corporate Compliance individuals responsible for hot line operations and in collaboration with other CCH departments, including but not limited to Human Resources and General Counsel, will maintain complete and accurate records of information received, and will also take all appropriate steps to avoid compromising those with whom they are in communication.
- E. All information identifying hot line reports, or information which could lead to the identification of reporters or correspondents to the hot line operation, will be expunged once record retention requirements are met.
- F. The Chief Compliance & Privacy Officer or designee shall have the responsibility, autonomy, authority and necessary resources to ensure that all compliance issues and concerns reported to the hot line operation are promptly and appropriately addressed and resolved.
- G. The Chief Compliance & Privacy Officer or designee shall communicate any matter deemed potentially illegal to the office of the CCH General Counsel.
- H. The Chief Compliance & Privacy Officer or designee has the responsibility and authority to ensure that any matter requiring external reporting to grant funders, regulatory or law enforcement agencies is properly disclosed.
- I. The Chief Compliance & Privacy Officer or designee has the responsibility and authority to bring such an issue to the attention of the senior executives in cases where, in his or her good-faith judgment, it is appropriate to do so.

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REVIEW HISTORY:

Initial Adoption: 06/08/2010¹

Request Approval: 06/20/2019

¹ Initial adoption by the Audit & Compliance Committee of the Board of Directors of the Cook County Health on Tuesday, June 8, 2010 at the hour of 9:30 A.M., at John H. Stroger, Jr. Hospital of Cook County, 1901 W. Harrison Street, in the fifth floor conference room, Chicago, Illinois.